



**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

FILED

07-10-06
04:59 PM

Order Instituting Rulemaking Regarding Policies,)
Procedures and Rules for the California Solar)
Initiative, the Self-Generation Incentive Program)
and Other Distributed Generation Issues.)

Rulemaking 06-03-004
(Filed March 2, 2006)

**COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON ALJ
RULING REQUESTING COMMENT ON PROPOSAL FOR SOLAR WATER
HEATING PILOT PROGRAM**

MICHAEL D. MONTOYA
AMBER E. DEAN

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-6961
Facsimile: (626) 302-7740
E-mail: amber.dean@sce.com

Dated: **July 10, 2006**

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

Order Instituting Rulemaking Regarding Policies,)	
Procedures and Rules for the California Solar)	Rulemaking 06-03-004
Initiative, the Self-Generation Incentive Program)	(Filed March 2, 2006)
<u>and Other Distributed Generation Issues.)</u>	

**REPLY COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E)
ON ALJ RULING REQUESTING COMMENT ON PROPOSAL FOR SOLAR WATER
HEATING PILOT PROGRAM**

I.

INTRODUCTION

Pursuant to ALJ Duda's June 8, 2006 Ruling Requesting Comment on San Diego Regional Energy Office's (SDREO) proposal for a Solar Water Heating Pilot Program (SWH Pilot), Southern California Edison Company (SCE) submits the following reply comments. In summary:

- Consistent with parties' support for measurement and evaluation (M&E), the Commission should adopt a thorough M&E protocol for the SWH Pilot.
- The SWH Pilot should not be expanded statewide until thorough measurement and evaluation is conducted and the Commission takes affirmative action to expand the program statewide.
- If the Commission determines that immediate statewide expansion of SWH Pilot is appropriate, then SCE should be the administrator for the program in its service territory.

- The SWH Pilot should not include technologies that were not approved by the Commission.

II.

REPLY COMMENTS

A. Parties Support Thorough Measurement and Evaluation of the SWH Pilot.

As stated in SCE’s Opening Comments, “Adopting a thorough M&E component for the pilot will help the Commission understand issues such as cost-effectiveness, the potential to reduce cost over time, and whether SWH successfully displaces gas and electric water heating.”¹ Other parties concur that a thorough measurement and evaluation protocol is critical to assessing the need for and success of any SWH program. For example, the Division of Ratepayer Advocates (DRA) recommends that SDREO be required to provide a quarterly progress report, a Market Impacts Report to provide guidance on whether to extend the pilot, and an Impact Evaluation Report that reflects energy savings. SDG&E and SoCalGas state that the pilot must “gather and assess needed empirical cost and performance data on SWH systems and program administration to determine the current cost-effectiveness gap of SWH and other key market hurdles that inhibit market transformation and establishment of an incentive-free sustainable SWH program.”² SCE further agrees with SDG&E and SoCalGas that program cost-effectiveness should be evaluated from the perspective of participants, ratepayers, and society as a whole. Consistent with SCE’s and other parties’ opening comments, SCE urges the Commission to adopt a well designed and thorough measurement and evaluation protocol to determine the overall success of the pilot, as well as whether the pilot should be expanded or extended.

¹ SCE’s Opening Comments, p. 4.

² SDG&E & SoCalGas Comments, p. 2. SDG&E and SoCalGas further provide a list of recommended M&E activities on pages 5-6 of their Comments.

B. The SWH Pilot Should Not Be Expanded Statewide Until Thorough Measurement And Evaluation Is Conducted and the Commission Takes Affirmative Action to Expand the Program Statewide.

As SCE highlighted in its Opening Comments, the Commission ordered a limited pilot because the Commission was concerned that prior incentive programs had the unintended effect of raising equipment prices.³ The Commission also sought the opportunity to evaluate the impacts of an incentive for SWH on equipment prices, demand, and overall cost-effectiveness.⁴ Several parties argue that a pilot in San Diego Gas and Electric's service territory is unnecessary and that a SWH program should be implemented statewide immediately.⁵ A number of parties, however, highlight that appropriate incentive levels for the SWH pilot should be investigated,⁶ and that previous SWH initiatives provided "over rich" subsidies that resulted in increased system prices.⁷ In light of the Commission's stated objectives in adopting a limited pilot, as well as certain parties' concerns that appropriate incentive levels may require further analysis, SCE agrees with SDG&E and SoCalGas that "expansion or extension of the Pilot beyond its original scope or expanding any of its elements to other IOU territories statewide should occur only after careful evaluation of how the Program met its objectives and by affirmative action of the Commission."⁸

³ *Id.*, pp. 13-14.

⁴ D.06-01-024, p. 13.

⁵ It is worth noting that similar arguments were raised in comments on D.06-01-024 in draft form, but the Commission nevertheless adopted a limited pilot in SDG&E's service territory. *See, e.g.*, CalSEIA Opening Comments on Draft D.06-01-024, pp. 6-8 (stating that a SWH program should be statewide); SDREO Reply Comments on Draft D.06-01-024, p. 5 (suggesting that the Commission should possibly expand the pilot statewide).

⁶ *See, e.g.*, PG&E Opening Comments, p. 6 (noting that tax incentives and the corresponding market impact were not addressed in the SWH proposal, and that the Commission and SDREO should investigate these issues in setting incentive levels); SDG&E & SoCalGas Comments, p. 3 (stating that SDREO should provide the Commission with detailed information outlining the specific payback period for the SWH systems considered under the pilot so that the Commission may determine the appropriate incentive level to address market barriers); SCE Opening Comments, p. 6 (stating that proposed incentive levels should be supported with data).

⁷ CARE Opening Comments, p. 2 (noting that the industry previously took advantage of "over rich" subsidies).

⁸ SDG&E & SoCalGas Opening Comments, p. 3.

As CalSEIA notes in its comments, SWH is ubiquitous in Europe and is in widespread use elsewhere in the world.⁹ Given this wide acceptance of SWH technology, one might logically question whether incentives are needed to promote the acceptance of SWH. Thus, SCE views a primary purpose of an incentive program as a means to better understand market barriers and other reasons for limited acceptance of SWH in California. Without the evidence that a pilot SWH program can provide, it would be wrong to conclude, as CalSEIA apparently does, that incentives are a necessary part of an overall state SWH program.

C. If the Commission Determines that an Immediate Statewide Expansion of SWH is Appropriate, then SCE Should Be the Program Administrator in its Service Territory.

If the Commission authorizes a statewide expansion of the SWH pilot program, SCE recommends that administration of the program should be delegated to the current SGIP administrators. DRA echoes this recommendation.¹⁰ Although SCE does not support expansion of the SWH program until pilot results can be evaluated, SCE should be tasked with administering any SWH program in its service territory, whether that program is adopted now or in the future. As SCE has commented in the context of other CSI proposals, SCE is best suited to administer all aspects of the CSI in its territory because it has extensive experience in handling large numbers of applications and incentive administration. SCE can also leverage existing infrastructure to coordinate program administration with marketing, outreach, energy efficiency and CSI program requirements. Additionally, through administration of SCE's energy efficiency, demand response, low income, and SGIP programs, SCE has developed positive relationships with customers and local authorities in its service territory. For these reasons, if the

⁹ CalSEIA's Opening Comments, p. 2.

¹⁰ DRA Opening Comments, p. 2. PG&E also agrees with this position, advocating that it should administer any SWH program in its territory. PG&E Opening Comments, pp. 2-4.

Commission determines that it is appropriate to expand SWH statewide, SCE should be tasked with administering the program in its service territory.

D. The SWH Pilot Should Not Include Technologies that Were Not Approved by the Commission.

CARE argues that “other technologies, such as Heating and Cooling, should be considered immediately for the California pilot.”¹¹ CCSF states that additional applications such as space-heating, space-cooling or air conditioning should be included in the pilot.”¹² However, in directing SDREO to develop a pilot program, the Commission explicitly excluded solar heating and cooling from the pilot at this time, stating, “We need further information about the technology involved in solar heating and air conditioning before committing to include them in the SDREO pilot program on solar water heating.”¹³ Further detail concerning these technologies was not provided in the SWH Pilot proposal or parties’ comments. Consistent with the Commission’s direction, the SWH Pilot should not include technologies that were not approved by the Commission in D.06-01-024. If and when the Commission obtains further information about solar heating and cooling technologies, the Commission may include these technologies in any expansion of the SWH Pilot or in the larger CSI program portfolio, if the Commission determines that incentives for those technologies will further the objectives of the CSI.

III.

CONCLUSION

SCE appreciates the opportunity to submit Reply Comments on SDREO’s Proposal for a Solar Water Heating Pilot. For the reasons stated above and in its Opening Comments, SCE

¹¹ CARE Opening Comments, p. 5.

¹² CCSF Opening Comments, p. 3.

¹³ D.06-01-024, p. 14.

respectfully asks the Commission to advance the value of the solar water heating pilot and consider the following recommendations in adopting a SWH pilot program:

- Consistent with parties' support for measurement and evaluation (M&E), the Commission should adopt a thorough M&E protocol for the SWH Pilot.
- The SWH Pilot should not be expanded statewide until thorough measurement and evaluation is conducted and the Commission takes affirmative action to expand the program statewide.
- If the Commission determines that immediate statewide expansion of SWH Pilot is appropriate, then SCE should be the administrator for the program in its service territory.
- The SWH Pilot should not include technologies that were not approved by the Commission.

Respectfully submitted,

MICHAEL D. MONTOYA
AMBER E. DEAN

/s/ AMBER E. DEAN

By: Amber E. Dean

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-6961
Facsimile: (626) 302-7740
E-mail: amber.dean@sce.com

July 10, 2006

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of REPLY COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON ALJ RULING REQUESTING COMMENT ON PROPOSAL FOR SOLAR WATER HEATING PILOT PROGRAM on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

Transmitting the copies via e-mail to all parties who have provided an e-mail address.

First class mail will be used if electronic service cannot be effectuated.

Executed this **10th day of July, 2006**, at Rosemead, California.

/s/ VICKI CARR-DONERSON

Vicki Carr-Donerson

Project Analyst

SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770

R.06-03-004

Monday, July 10, 2006

CASE ADMINISTRATION
SOUTHERN CALIFORNIA EDISON
COMPANY
2244 WALNUT GROVE AVE., RM. 370
ROSEMEAD, CA 91770
R.06-03-004

TOR ALLEN
EXECUTIVE DIRECTOR
THE RAHUS INSTITUTE
1535 CENTER AVE.
MARTINEZ, CA 94553
R.06-03-004

SCOTT J. ANDERS
RESEARCH/ADMINISTRATIVE CENTER
UNIVERSITY OF SAN DIEGO - LAW
5998 ALCALA PARK
SAN DIEGO, CA 92110
R.06-03-004

GALEN BARBOSE
LAWRENCE BERKELEY NATIONAL LAB
1 CYCLOTRON RD.
BERKELEY, CA 94720
R.06-03-004

Valerie Beck
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
AREA 4-A
SAN FRANCISCO, CA 94102-3214
R.06-03-004

R. THOMAS BEACH
CROSSBORDER ENERGY
2560 NINTH STREET, SUITE 316
BERKELEY, CA 94710
R.06-03-004

GENE BECK
ENVIROTECH FINANCIAL, INC.
333 CITY BLVD. W 17TH FL
ORANGE, CA 92868
R.06-03-004

C. SUSIE BERLIN
ATTORNEY AT LAW
MC CARTHY & BERLIN, LLP
100 PARK CENTER PLAZA, SUITE 501
SAN JOSE, CA 95113
R.06-03-004

JULIE BLUNDEN
SUNPOWER CORPORATION
430 INDIO WAY
SUNNYVALE, CA 94085
R.06-03-004

MARK BOLINGER
LAWRENCE BERKELEY NATIONAL
LABORATORY
ONCE CYCLOTRON ROAD
BERKELEY, CA 94720
R.06-03-004

MICHAEL E. BOYD
PRESIDENT
CALIFORNIANS FOR RENEWABLE
ENERGY, INC.
5439 SOQUEL DRIVE
SOQUEL, CA 95073
R.06-03-004

MICHELLE J. BREYER
GOLDMAN, SACHS & CO.
85 BROAD STREET, 29TH FLOOR
NEW YORK, NY 10004
R.06-03-004

DONALD BROOKHYSER
ATTORNEY AT LAW
ALCANTAR & KAHL LLP
1300 S.W. 5TH AVENUE, SUITE 1750
ALCANTAR & KAHL LLP
PORTLAND, OR 97201
R.06-03-004

LYNNE BROWN
CALIFORNIANS FOR RENEWABLE
ENERGY, INC.
24 HARBOR ROAD
SAN FRANCISCO, CA 94124
R.06-03-004

CARRIE CAMARENA
DEPUTY GENERAL COUNSEL
THE GREENLINING INSTITUTE
1918 University Ave, 2nd Floor
BERKELEY, CA 94704
R.06-03-004

MICHAEL CAMPBELL
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, MC B9A
SAN FRANCISCO, CA 94177
R.06-03-004

STEVE CHADIMA
ENERGY INNOVATIONS, INC.
130 WEST UNION STREET
PASADENA, CA 91103
R.06-03-004

CLIFF CHEN
UNION OF CONCERNED SCIENTIST
2397 SHATTUCK AVENUE, STE 203
BERKELEY, CA 94704
R.06-03-004

R.06-03-004

Monday, July 10, 2006

BRIAN K. CHERRY
REGULATORY RELATIONS
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000 B10C
SAN FRANCISCO, CA 94177-0001
R.06-03-004

HOWARD CHOY
LOS ANGELES COUNTY ISD, FACILITIES
OPERA
1100 NORTH EASTERN AVENUE
LOS ANGELES, CA 90063
R.06-03-004

JEANNE CLINTON
KW ENGINEERING
2232 WARD STREET
BERKELEY, CA 94705
R.06-03-004

NONYA COLLIER
THE GREENLINING INSTITUTE
1918 UNIVERSITY AVENUE, 2ND FLOOR
BERKELEY, CA 94704
R.06-03-004

MICHAEL COLVIN
DIVISION OF STRATEGIC PLANNING
CALIFORNIA PUBLIC UTILITIES
COMMISSION
505 VAN NESS AVE
SAN FRANCISCO, CA 94102
R.06-03-004

DAVID J. COYLE
ANZA ELECTRIC COOPERATIVE, INC
58470 HIGHWAY CO-OPERATIVE INC
PO BOX 391090
ANZA, CA 92539-1909
R.06-03-004

KYLE L. DAVIS
PACIFICORP
825 NE MULTNOMAH,
PORTLAND, OR 97232
R.06-03-004

MICHAEL B. DAY
ATTORNEY AT LAW
GOODIN MACBRIDE SQUERI RITCHIE &
DAY LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
R.06-03-004

REGINA M. DEANGELIS
ATTORNEY AT LAW
CALIFORNIA PUBLIC UTILITIES
COMMISSION
505 VAN NESS AVENUE
ROOM 4107
SAN FRANCISCO, CA 94102-3214
R.06-03-004

AMBER DEAN
SOUTHERN CALIFORNIA EDISON
COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
R.06-03-004

RALPH DENNIS
DIRECTOR, REGULATORY AFFAIRS
FELLON-MCCORD & ASSOCIATES
9960 CORPORATE CAMPUS DRIVE, SUITE
2000
LOUISVILLE, KY 40223
R.06-03-004

Paul Douglas
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
AREA 4-A
SAN FRANCISCO, CA 94102-3214-3214
R.06-03-004

TRACEY DRABANT
ENERGY RESOURCE MANAGER
BEAR VALLEY ELECTRIC SERVICE
42020 GARSTIN DRIVE
PO BOX 1547
BIG BEAR LAKE, CA 92315-1194
R.06-03-004

DOROTHY DUDA
CALIFORNIA PUBLIC UTILITIES
COMMISSION
505 VAN NESS AVENUE
ADMINISTRATIVE LAW JUDGE DIVISION
RM 5109
SAN FRANCISCO, CA 94102
R.06-03-004

HARVEY M. EDER
PUBLIC SOLAR POWER COALITION
1218 12TH STREET, NO. 25
SANTA MONICA, CA 90401
R.06-03-004

STEVE ENDO
PASADENA DEPARTMENT OF WATER &
POWER
45 EAST GLENARM STREET
PASADENA, CA 91105
R.06-03-004

CLAY FABER
SAN DIEGO GAS & ELECTRIC COMPANY
555 WEST FIFTH STREET, GT14D6
LOS ANGELES, CA 90013
R.06-03-004

DIANE I. FELLMAN
ATTORNEY AT LAW
FPL ENERGY, LLC
234 VAN NESS AVENUE
SAN FRANCISCO, CA 94102
R.06-03-004

R.06-03-004

Monday, July 10, 2006

Julie A Fitch
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
EXECUTIVE DIVISION ROOM 5203
SAN FRANCISCO, CA 94102-3214
R.06-03-004

VICTORIA P. FLEMING
NAVIGANT CONSULTING, INC.
3100 ZINFANDEL DRIVE, SUITE 600
RANCHO CORDOVA, CA 95670-6078
R.06-03-004

ORLANDO B. FOOTE
HORTON, KNOX, CARTER & FOOTE
895 BROADWAY STREET
EL CENTRO, CA 92243-2341
R.06-03-004

TONY FOSTER
ITRON INC.
1111 BROADWAY, STE 1800
OAKLAND, CA 94607
R.06-03-004

STEPHEN FRANTZ
6301 S STREET, MS A353
SACRAMENTO, CA 95817
R.06-03-004

MATTHEW FREEDMAN
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102
R.06-03-004

SUSAN FREEDMAN
SAN DIEGO REGIONAL ENERGY OFFICE
8520 TECH WAY, SUITE 110
SAN DIEGO, CA 92123
R.06-03-004

LAURA FULTZ
5004 E UNIVERSITY AVE
FRESNO, CA 93727
R.06-03-004

JOHN GALLOWAY
UNION OF CONCERNED SCIENTISTS
2397 SHATTUCK AVENUE, SUITE 203
BERKELEY, CA 94704
R.06-03-004

GARY GERBER
SUNLIGHT & POWER COMPANY
1035 FOLGER AVENUE
BERKELEY, CA 94710
R.06-03-004

LORI A. GLOVER
PRESIDENT
S.O.L.I.D. USA, INC.
10645 N. TATUM BLVD., SUITE 200-306
PHOENIX, AZ 85028
R.06-03-004

ROBERT GNAIZDA
THE GREENLINING INSTITUTE
1918 UNIVERSITY AVENUE, SECOND
FLOOR
BERKELEY, CA 94704
R.06-03-004

ELSTON K. GRUBAUGH
IMPERIAL IRRIGATION DISTRICT
333 EAST BARIONI BLVD.
IMPERIAL, CA 92251
R.06-03-004

JANICE G. HAMRIN
CENTER FOR RESOURCE SOLUTIONS
PO BOX 29512
SAN FRANCISCO, CA 94129
R.06-03-004

ARNO HARRIS
PO BOX 6903
SAN RAFAEL, CA 94903
R.06-03-004

JOSHUA HARRIS
LAW OFFICES OF STEPHAN C. VOLKER
436 14TH STREET, SUITE 1300
OAKLAND, CA 94612
R.06-03-004

CHRISTOPHER HILEN
ATTORNEY AT LAW
DAVIS, WRIGHT TREMAINE, LLP
ONE EMBARCADERO CENTER, SUITE 600
SAN FRANCISCO, CA 94111
R.06-03-004

GARY HINNERS
RELIANT ENERGY, INC.
PO BOX 148
HOUSTON, TX 77001-0148
R.06-03-004

R.06-03-004

Monday, July 10, 2006

Suzy Hong
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 5125
SAN FRANCISCO, CA 94102-3214
R.06-03-004

DAVID HOCHSCHILD
PV NOW
3857 - 20TH STREET
SAN FRANCISCO, CA 94114
R.06-03-004

TOM HOFF
CLEAN POWER RESEARCH
10 GLEN CT.
NAPA, CA 94558
R.06-03-004

HEATHER HUNT
W.H. ROBERT & H.F. HUNT, LLC
242 WHIPPOORWILL LANE
STRATFORD, CT 6614
R.06-03-004

MICHAEL HYAMS
SAN FRANCISCO PUBLIC UTILITIES COMM
1155 MARKET ST., 4/F
SAN FRANCISCO, CA 94103
R.06-03-004

EPIC INTERN
EPIC/USD SCHOOL OF LAW
5998 ALCALA PARK
SAN DIEGO, CA 92110
R.06-03-004

RONALD K. ISHII
AESC, INC.
5927 BALFOUR COURT, SUITE 213
CARLSBAD, CA 92008
R.06-03-004

AKBAR JAZAYERI
SOUTHERN CALIFORNIA EDISON
COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
R.06-03-004

BRUNO JEIDER
BURBANK WATER AND POWER
164 WEST MAGNOLIA BOULEVARD
BURBANK, CA 91502
R.06-03-004

JOHN JENSEN
PRESIDENT
MOUNTAIN UTILITIES
PO BOX. 205
PO BOX. 205
KIRKWOOD, CA 95646
R.06-03-004

MARK JOHNSON
GOLDEN SIERRA POWER
PO BOX 551432
SOUTH LAKE TAHOE, CA 96155
R.06-03-004

MARC D. JOSEPH
ATTORNEY AT LAW
ADAMS BROADWELL JOSEPH & CARDOZO
601 GATEWAY BLVD., STE. 1000
SOUTH SAN FRANCISCO, CA 94080
R.06-03-004

EVELYN KAHL
ATTORNEY AT LAW
ALCANTAR & KAHL LLP
120 MONTGOMERY STREET, SUITE 2200
SAN FRANCISCO, CA 94104
R.06-03-004

MARTIN KAY
PROGRAM SUPERVISOR
SOUTH COAST AIR QUALITY
MANAGEMENT DISTRICT
21865 COPLEY DR.
DIAMOND BAR, CA 91765-3252
R.06-03-004

CAROLYN KEHREIN
ENERGY MANAGEMENT SERVICES
1505 DUNLAP COURT
DIXON, CA 95620-4208
R.06-03-004

GRANT KOLLING
SENIOR ASSISTANT CITY ATTORNEY
CITY OF PALO ALTO
250 HAMILTON AVENUE, 8TH FLOOR
PALO ALTO, CA 94301
R.06-03-004

DAVID KOPANS
FAT SPANIEL TECHNOLOGIES, INC.
2 PRINCETON ROAD
ARLINGTON, MA 2474
R.06-03-004

P. KUBASEK
CSBU
GO1 QUAD 2A 220T
,
R.06-03-004

R.06-03-004

Monday, July 10, 2006

SUSAN KULAKOWSKI
CAMPUS ENERGY MANAGER
327 BONAIR SIDING
STANFORD, CA 94602
R.06-03-004

MICHAEL KYES
7423 SHAUN CT.
SEBASTOPOL, CA 95472
R.06-03-004

ERIC LARSEN
ENVIRONMENTAL SCIENTIST
RCM BIOTHANE
2850 POPLAR STREET
OAKLAND, CA 94608
R.06-03-004

DOUGLAS LARSON
PACIFICORP
201 SOUTH MAIN STREET, SUITE 2300
SALT LAKE CITY, UT 84140
R.06-03-004

ROD LARSON
LARSON CONSULTING SERVICES
973 E. FRONT STREET
VENTURA, CA 93001
R.06-03-004

DONALD C. LIDDELL
DOUGLASS & LIDDELL
2928 2ND AVENUE
SAN DIEGO, CA 92103
R.06-03-004

KAREN LINDH
LINDH & ASSOCIATES
7909 WALERGA ROAD, NO. 112
CMTA
ANTELOPE, CA 95843
R.06-03-004

STEVEN G. LINS
CITY OF GLENDALE
613 EAST BROADWAY, SUITE 220
GLENDALE, CA 91206-4394
R.06-03-004

RANDY LITTENEKER
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442
SAN FRANCISCO, CA 94120
R.06-03-004

DICK LOWRY
5901 BOLSA AVENUE
HUNTINGTON BEACH, CA 92647
R.06-03-004

JAY LUBOFF
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, MC B9A
SAN FRANCISCO, CA 94177
R.06-03-004

JANE E. LUCKHARDT
ATTORNEY AT LAW
DOWNEY BRAND LLP
555 CAPITOL MALL, 10TH FLOOR
SACRAMENTO, CA 95814
R.06-03-004

MARY LUEVANO
GLOBAL GREEN USA
2218 MAIN STREET, 2ND FLOOR
SANTA MONICA, CA 90405
R.06-03-004

MEGAN MACNEIL MYERS
PO BOX 638
LAKEPORT, CA 95453
R.06-03-004

CHUCK MANZUK
SEMPRA UTILITIES
8330 CENTURY PARK COURT, CP 32D
CALIFORNIA REGULATORY AFFAIRS
SAN DIEGO, CA 92123
R.06-03-004

ROBERT MARSHALL
PLUMAS-SIERRA RURAL ELECTRIC CO-OP
73233 HIGHWAY 70 STE A
PORTOLA, CA 96122-2000
R.06-03-004

CHRISTOPHER MAYER
MODESTO IRRIGATION DISTRICT
PO BOX 4060
MODESTO, CA 95352-4060-4060
R.06-03-004

KEITH MC CREA
ATTORNEY AT LAW
SUTHERLAND, ASBILL & BRENNAN
1275 PENNSYLVANIA AVENUE, NW
WASHINGTON, DC 20004-2415
R.06-03-004

R.06-03-004

Monday, July 10, 2006

RICHARD MCCANN, PH.D
M. CUBED
2655 PORTAGE BAY, SUITE 3
DAVIS, CA 95616
R.06-03-004

BARRY F MCCARTHY
ATTORNEY AT LAW
MCCARTHY & BERLIN, LLP
100 PARK CENTER PLAZA, SUITE 501
SAN JOSE, CA 95113
R.06-03-004

JAN E. MCFARLAND
AMERICANS FOR SOLAR POWER
1100 11TH STREET, SUITE 323
SACRAMENTO, CA 95814
R.06-03-004

PHILLIP MCLEOD
LAW & ECONOMICS CONSULTING GROUP
2000 POWELL STREET, STE 600
EMERYVILLE, CA 94608
R.06-03-004

JAMES MCTARNAGHAN
ATTORNEY AT LAW
DUANE MORRIS LLP
ONE MARKET, SPEAR TOWER, SUITE 2000
SAN FRANCISCO, CA 94105-1104
R.06-03-004

LIZ MERRY
EXECUTIVE DIRECTOR
NORCAL SOLAR
2402 WESTERNESSE RD.
DAVIS, CA 95616
R.06-03-004

STEPHEN MILLER
STRATEGIC ENERGY INNOVATIONS
185 N. REDWOOD DRIVE, SUITE 188
SAN RAFAEL, CA 94903
R.06-03-004

KAREN NORENE MILLS
ATTORNEY AT LAW
CALIFORNIA FARM BUREAU FEDERATION
2300 RIVER PLAZA DRIVE
SACRAMENTO, CA 95833
R.06-03-004

MICHAEL MONTOYA
SOUTHERN CALIFORNIA EDISON
COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
R.06-03-004

RONALD MOORE
GOLDEN STATE WATER/BEAR VALLEY
ELECTRIC
630 EAST FOOTHILL BLVD.
SAN DIMAS, CA 91773
R.06-03-004

TAKAKO MORITA
THELEN REID & PRIEST
101 SECOND ST., SUITE 1800
SAN FRANCISCO, CA 94105-3601
R.06-03-004

GREGG MORRIS
GREEN POWER INSTITUTE
2039 SHATTUCK AVE., SUITE 402
BERKELEY, CA 94704
R.06-03-004

SUSAN MUNVES
CITY OF SANTA MONICA
1212 5TH STREET
SANTA MONICA, CA 90401
R.06-03-004

SARA STECK MYERS
ATTORNEY AT LAW
LAW OFFICES OF SARA STECK MYERS
122 - 28TH AVENUE
SAN FRANCISCO, CA 94121
R.06-03-004

PAYAM NARVAND
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS -45
SACRAMENTO, CA 95814
R.06-03-004

LES NELSON
EXECUTIVE DIRECTOR
CALIFORNIA SOLAR ENERGY INDUSTRIES
ASSN
30012 AVENTURA, SUITE A
RANCHO SANTA MARGARITA, CA 92688
R.06-03-004

CHRISTOPHER O'BRIEN
SHARP SOLAR
VP STRATEGY AND GOVERNMENT
RELATIONS
3808 ALTON PLACE NW
WASHINGTON, DC 20016
R.06-03-004

NATHALIE OSBORN
PROJECT MANAGER
SAN DIEGO REGIONAL ENERGY OFFICE
8520 TECH WAY, SUITE 110
SAN DIEGO, CA 92123-1450
R.06-03-004

R.06-03-004

Monday, July 10, 2006

Lisa Paulo
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
AREA 4-A
SAN FRANCISCO, CA 94102-3214
R.06-03-004

LAURIE PARK
NAVIGANT CONSULTING, INC.
3100 ZINFANDEL DRIVE, SUITE 600
RANCHO CORDOVA, CA 95670-6078
R.06-03-004

STEVEN D. PATRICK
ATTORNEY AT LAW
SOUTHERN CALIFORNIA GAS COMPANY
555 WEST 5TH STREET, SUITE 1400
LOS ANGELES, CA 90013
R.06-03-004

NORMAN A. PEDERSEN
ATTORNEY AT LAW
HANNA AND MORTON LLP
444 FLOWER STREET, SUITE 2050
LOS ANGELES, CA 90071
R.06-03-004

ROGER PELOTE
WILLIAMS POWER COMPANY, INC.
12736 CALIFA STREET
VALLEY VILLAGE, CA 91607
R.06-03-004

JANIS PEPPER
Self
CLEAN POWER MARKETS, INC.
PO BOX 3206
LOS ALTOS, CA 94024
R.06-03-004

DAN PERKINS
ENERGY SMART HOMES
983 PHILLIPS ST.
VISTA, CA 92083
R.06-03-004

ROBERT L. PETTINATO
LOS ANGELES DEPARTMENT OF WATER &
POWER
111 NORTH HOPE STREET, ROOM 1151
LOS ANGELES, CA 90012-0100
R.06-03-004

PHILIP D. PETTINGILL
CAISO
151 BLUE RAVINE ROAD
FOLSOM, CA 95630
R.06-03-004

GORDON PICKERING
PRINCIPAL
NAVIGANT CONSULTING, INC.
3100 ZINFANDEL DRIVE, SUITE 600
RANCHO CORDOVA, CA 95670-6026
R.06-03-004

H. CLINTON PORTER
KACO SOLAR
1002 B OREILLEY AVENUE
SAN FRANCISCO, CA 94129
R.06-03-004

JENNIFER PORTER
POLICY ANALYST
SAN DIEGO REGIONAL ENERGY OFFICE
8520 TECH WAY - SUITE 110
SAN DIEGO, CA 92123
R.06-03-004

Terrie D Prosper
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 5301
SAN FRANCISCO, CA 94102-3214
R.06-03-004

STEVE RAHON
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK COURT, CP32C
SAN DIEGO, CA 92123-1548
R.06-03-004

JOHN REDDING
ARCTURUS ENERGY CONSULTING, INC.
44810 ROSEWOOD TERRACE
MENDOCINO, CA 95460
R.06-03-004

JAMES ROSS
REGULATORY & COGENERATION
SERVICES, INC.
500 CHESTERFIELD CENTER, SUITE 320
CHESTERFIELD, MO 63017
R.06-03-004

JP ROSS
THE VOTE SOLAR INITIATIVE
182 SECOND STREET, SUITE 400
SAN FRANCISCO, CA 94105
R.06-03-004

Don Schultz
CALIF PUBLIC UTILITIES COMMISSION
770 L STREET, SUITE 1050
RM. SCTO
SACRAMENTO, CA 95814
R.06-03-004

R.06-03-004

Monday, July 10, 2006

MICHAEL SCHEIBLE
DEPUTY EXECUTIVE OFFICER
CALIFORNIA AIR RESOURCES BOARD
1001 I STREET
SACRAMENTO, CA 95677
R.06-03-004

REED V. SCHMIDT
BARTLE WELLS ASSOCIATES
1889 ALCATRAZ AVENUE
California City-County Street Light Assoc.
BERKELEY, CA 94703-2714
R.06-03-004

ANDREW SCHWARTZ
CALIFORNIA PUBLIC UTILITIES
COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102
R.06-03-004

VINCENT SCHWENT
CALIFORNIA SOLAR ENERGY INDUSTRIES
ASSN.
3013 OYSTER BAY AVENUE
DAVIS, CA 95616
R.06-03-004

ELLEN SHAFNER
SOLEL, INC.
701 NORTH GREEN VALLEY PARKWAY,
STE. 200
HENDERSON, NV 89074
R.06-03-004

MICHAEL SHAMES
ATTORNEY AT LAW
UTILITY CONSUMERS' ACTION NETWORK
3100 FIFTH AVENUE, SUITE B
SAN DIEGO, CA 92103
R.06-03-004

Anne E. Simon
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 5024
SAN FRANCISCO, CA 94102-3214
R.06-03-004

MARY SIMMONS
SIERRA PACIFIC POWER COMPANY
PO BOX 10100
RENO, NV 89520-0026
R.06-03-004

KEVIN J. SIMONSEN
ENERGY MANAGEMENT SERVICES
646 EAST THIRD AVE
DURANGO, CO 81301
R.06-03-004

GEORGE SIMONS
PRINCIPAL RESEARCH CONSULTANT
ITRON
1104 MAIN STREET, SUITE 630
VANCOUVER, WA 98660
R.06-03-004

MARK J. SKOWRONSKI
SOLARGENIX /INLAND ENERGY
3501 JAMBOREE ROAD, SUITE 606
NEWPORT BEACH, CA 92660
R.06-03-004

Donald R Smith
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4209
SAN FRANCISCO, CA 94102-3214
R.06-03-004

FRASER D. SMITH
CITY AND COUNTY OF SAN FRANCISCO
SAN FRANCISCO PUBLIC UTILITIES COMM
1155 MARKET STREET, 4TH FLOOR
SAN FRANCISCO, CA 94103
R.06-03-004

KARI SMITH
POWERLIGHT CORPORATION
2954 SAN PABLO AVENUE
BERKELEY, CA 94706
R.06-03-004

JAMES D. SQUERI
ATTORNEY AT LAW
GOODIN MACBRIDE SQUERI RITCHIE &
DAY LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
R.06-03-004

SEEMA SRINIVASAN
ALCANTAR & KAHL
120 MONTGOMERY STREET, SUITE 2200
SAN FRANCISCO, CA 94104
R.06-03-004

IRENE M. STILLINGS
SAN DIEGO REGIONAL ENERGY OFFICE
8520 TECH WAY, SUITE 110
SAN DIEGO, CA 92123
R.06-03-004

MARK STOUT
MAJOR ACCOUNTS - UNLIMITED ENERGY
BSEE/MA ENERGY AND RESOURCES
5004 E UNIVERSITY AVE
FRESNO, CA 93727
R.06-03-004

R.06-03-004

Monday, July 10, 2006

Christine S Tam
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4209
SAN FRANCISCO, CA 94102-3214
R.06-03-004

KAREN TERRANOVA
ALCANTAR & KAHL LLP
120 MONTGOMERY STREET, STE 2200
SAN FRANCISCO, CA 94104
R.06-03-004

DAN THOMPSON
SPG SOLAR
863 E. FRANCISCO BLVD.
SAN RAFAEL, CA 94901
R.06-03-004

SCOTT TOMASHEFSKY
REGULATORY AFFAIRS MANAGER
NORTHERN CALIFORNIA POWER AGENCY
180 CIRBY WAY
NORTHERN CALIFORNIA POWER AGENCY
ROSEVILLE, CA 95678
R.06-03-004

NELLIE TONG
KEMA, INC.
492 NINTH STREET, SUITE 220
OAKLAND, CA 94607
R.06-03-004

LUKE TOUGAS
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, MC B9A
SAN FRANCISCO, CA 94177
R.06-03-004

ANN L. TROWBRIDGE
ATTORNEY AT LAW
DOWNEY BRAND, LLP
555 CAPITOL MALL, 10TH FLOOR
SACRAMENTO, CA 95814-4686
R.06-03-004

SARAH TUNTLAND
2709 MCALLISTER, APARTMENT C
SAN FRANCISCO, CA 94118
R.06-03-004

JAMES TURNURE
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, MAIL CODE B9A
SAN FRANCISCO, CA 94105-1814
R.06-03-004

LISA URICK
ATTORNEY AT LAW
SAN DIEGO GAS & ELECTRIC COMPANY
555 W. FIFTH STREET, SUITE 1400
LOS ANGELES, CA 90013
R.06-03-004

ANDREW J. VAN HORN
VAN HORN CONSULTING
12 LIND COURT
ORINDA, CA 94563
R.06-03-004

MARIANNE WALPERT
PACIFIC POWER MANAGEMENT
12970 EARHART AVE. SUITE 110
AUBURN, CA 95602
R.06-03-004

WILLIAM W. WESTERFIELD III
STOEL RIVES LLP
770 L STREET, SUITE 800
SACRAMENTO, CA 95814
R.06-03-004

GREGGORY L. WHEATLAND
ATTORNEY AT LAW
ELLISON, SCHNEIDER & HARRIS
2015 H STREET
SACRAMENTO, CA 95814
R.06-03-004

JOSEPH F. WIEDMAN
GOODIN MACBRIDE SQUERI RITCHIE &
DAY, LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
R.06-03-004

JEFF WILSON
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS 45
SACRAMENTO, CA 95814-5512
R.06-03-004

RYAN WISER
BERKELEY LAB
ONE CYCLOTRON ROAD
BERKELEY, CA 94720
R.06-03-004

ALEXIS K. WODTKE
ATTORNEY AT LAW
CONSUMER FEDERATION OF CALIFORNIA
(CFC)
520 S. EL CAMINO REAL, STE. 340
SAN MATEO, CA 94402
R.06-03-004

R.06-03-004

Monday, July 10, 2006

CATHY S. WOOLLUMS
MIDAMERICAN ENERGY HOLDINGS
COMPANY
106 EAST SECOND STREET
DAVENPORT, IA 52801
R.06-03-004

JOSEPHINE WU
PACIFIC GAS & ELECTRIC COMPANY
PO BOX 770000, MAIL CODE B9A
SAN FRANCISCO, CA 94177
R.06-03-004

JOY C. YAMAGATA
REGULATORY MANAGER SDG&E
SEMPRA UTILITIES
8330 CENTURY PARK COURT, CP-32B
SAN DIEGO, CA 92123
R.06-03-004

MICHAEL YAMBRACH
SOLAR ENERGY PRODUCTION
CORPORATION
1487 POINSETTIA AVE., SUITE 124
VISTA, CA 92081
R.06-03-004

GARY M. YEE
INDUSTRIAL SECTION
CALIFORNIA AIR RESOURCES BOARD
PO BOX 2815
SACRAMENTO, CA 95812
R.06-03-004

ERIC YUSSMAN
REGULATORY ANALYST
FELLON-MCCORD & ASSOCIATES
9960 CORPORATE CAMPUS DRIVE
LOUISVILLE, KY 40223
R.06-03-004

MRW & ASSOCIATES, INC.
1999 HARRISON STREET, SUITE 1440
OAKLAND, CA 94612
R.06-03-004

CALIFORNIA ENERGY MARKETS
517 B POTRERO AVENUE
SAN FRANCISCO, CA 94110-1431
R.06-03-004

CALIFORNIA ENVIRONMENTAL
PROTECTION
PO BOX 2815
SACRAMENTO, CA 95812-2815
R.06-03-004